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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY:

DEPUTY

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8 CORPORATION; BANK OF AMERICA
CORPORATION; ANGELO MOZILO;
9 DAVID SAMBOL; STANFORD KURLAND;
and CARLOS GARCIA

10 [Additional Counsel Listed in Signature Block]
11

12 **UNITED STATES DISTRICT COURT**
13 **SOUTHERN DISTRICT OF CALIFORNIA**

14 **'08 CV 1348 ... BLM**

15 **PEOPLE OF THE STATE OF**
16 **CALIFORNIA,**

17 **Plaintiff,**

18 **v.**

19 **COUNTRYWIDE FINANCIAL**
20 **CORPORATION, a Delaware**
21 **corporation; BANK OF AMERICA, a**
22 **Delaware corporation; ANGELO**
23 **MOZILO, an individual; DAVID**
24 **SAMBOL, an individual; STANFORD**
25 **KURLAND, an individual; CARLOS**
26 **GARCIA, an individual; DOES 1-200,**
27 **and ROES 1-500, inclusive,**

28 **Defendants.**

Case No.

**DEFENDANTS' NOTICE OF
RELATED CASES PURSUANT TO
LOCAL RULE 40.1(e)**

DEFENDANTS' NOTICE OF
RELATED CASES

1 TO THE CLERK OF THIS COURT, ALL PARTIES AND COUNSEL OF
2 RECORD:

3 Pursuant to Local Rule 40.1(e), Defendants state that the following
4 additional action pending before this Court appear to be related to this action:

5 1. *Hursh v. Countrywide Financial Corp.*, Case No. 08 CV 1313-J-NLS
6 (S.D. Cal.).

7 2. These actions are related because they: (a) arise from the same or
8 substantially identical transactions, happenings, or events; and (b) are likely for other
9 reasons to entail substantial duplication of labor if heard by different judges.

10 3. The two actions involve common issues of law and fact, common
11 parties, and common witnesses.

12 4. The two actions also rely on substantially similar facts and seek to
13 recover damages from Defendants for allegedly similar harms and grievances.

14 5. Plaintiffs allege that Defendants originated or serviced residential
15 mortgage loans, in an unlawful, unfair, or deceptive fashion by misrepresenting or
16 concealing the terms, risks, or suitability of the loans, and/or by placing borrowers in
17 loans that they could not afford. Plaintiffs allege that as a result of Defendants' alleged
18 conduct, they (or, in the attorney general action, consumers on whose behalf the claims
19 are being brought) suffered damages stemming from higher interest rates than they
20 anticipated paying, negative amortization, prepayment penalties, and other allegedly
21 undisclosed or partially disclosed fees or expenses. Plaintiffs also allege that Defendants'
22 conduct led to foreclosures and harm to plaintiffs' credit and financial position.

23 6. Pursuant to Rule 40.1(e), assignment of these actions to a single
24 judge will ensure that both the parties' and the Court's resources are utilized efficiently.
25 Assignment to a single judge will avoid the confusion of issues, duplicative effort, and the
26 potentially inconsistent results if these actions continue to proceed before separate judges.

1 Dated: July 25, 2008

Respectfully submitted,

(faxed)

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